

## **Anti-Slavery and Human Trafficking Policy**

### **Overview of Act**

The Modern Slavery Act 2015 legislation enhances the support and protection for victims of human trafficking and enslavement.

Swanton Consulting is wholly supportive of the Act. This policy will be reviewed annually to ensure compliance is maintained.

### **Swanton Policy Statement**

Will continue to monitor all and record anti-slavery checks for all personnel working within our business. In addition to this we will ensure any sub consultants reflect our standards.

### **Responsibility for the Policy**

The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them, understand and comply with this policy.

### **Processes to Combat Trafficking and Slavery**

We are committed to providing our staff with a salary which, as a minimum, meets the National Living Wage and offering at least statutory leave entitlement. Furthermore, we ensure all our staff have provided their National Insurance number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

By checking our employees' NI numbers or Working Visa's we know they are legally eligible to work in the UK, and that their salary will be monitored by HMRC.

### **Training and Awareness**

We utilise our own cloud-based intranet system known internally as E-Zone. This system is continuously updated and alerts relevant employees when contracts and Working Visas are due to expire. E-Zone is also used to share information instantaneously to all our employees, which means we can distribute awareness bulletins, advice, and guidance on a range of topics, including our stance against forced labour and human trafficking.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Simon Bahaire BEng Hons DIS CEng MICE

Director

Swanton Consulting Ltd

20<sup>th</sup> June 2025

